IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Tadd Gilleo : Chapter 13

Case No. 20-12448-AMC

Debtor(s) :

RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY FILED BY U.S. BANK NATIONAL ASSOCIATION

Debtor, Tadd Gilleo, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by U.S. Bank National Association hereby submit the following:

- 1. Admitted
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. Denied. Debtor avers all payments have been made to date.
- 7. Debtor opposes the same.
- 8. Denied. Debtor avers all payments have been made to date.
- 9. Denied..
- 10. No response required.

WHEREFORE, Debtor, by and through the undersigned counsel, respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C.§ 362.

/s/ Brad J. Sadek, Esq.

Dated: December 23, 2022 Brad J. Sadek, Esq.

Attorney for the Debtor Sadek & Cooper 1500 JFK Boulevard Suite #220 Philadelphia, PA 19102 (215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West, Esq.

Standing Chapter 13 Trustee Electronic Notice

Denise Carlon, Esq.

Attorney for Movant *U.S. Bank National Association* Electronic Notice to *bkgroup@kmllawgroup.com*

Dated: December 23, 2022 /s/Brad J. Sadek, Esq

Brad J. Sadek, Esq. Attorney for Debtor(s)